

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRAVCO INSURANCE COMPANY,

Plaintiff,

v.

ROBERT CRIMO, JR., ROBERT CRIMO, III, KEELY
ROBERTS, individually and as parent and next
friend of C.R. and L.R., JASON ROBERTS,
individually and as parent and next friend of C.R.
and L.R., LAUREN BENNETT, individually and as a
parent and next friend of T.B. and W.B., MICHAEL
BENNETT, individually and as parent and next
friend of W.B. and T.B., TERRIE BENNETT,
JEFFREY BENNETT, DEBORAH SAMUELS, ELLIOT
SAMUELS, BRUCE SUNDHEIM, as Special
Administrator of the Estate of JACQUELINE
SUNDHEIM, deceased, PETER STRAUS AND
JONATHAN STRAUS, as Co-Administrators of the
Estate of STEPHEN STRAUS, deceased, LORENA
REBOLLAR SEDANO, MIRNA RODRIGUEZ,
individually and as parent and next-friend of J.S.,
K.S., and O.S., OSCAR SANCHEZ, individually and a
parent and next-friend of J.S., K.S., and O.S.,
AMELIA TENORIO, individually and as parent and
next-friend of C.M., ANTONIO MELGAR,
individually and as parent and next-friend of C.M,
SYLVIA VERGARA, LIZET MONTEZ, GABRIELLA
VERGARA, RICARDO TOLEDO, individually and a
Special Administrator of the Estate of NICOLAS
TOLEDO, deceased, PETRA TOLEDO, JOSEFINA
TOLEDO, ALEJO TOLEDO, MICHAEL ZEIFERT,
individually and as parent and next-friend of
B.R.Z., B.M.Z., K.Z., and L.Z., CHRISTINE ZEIFERT,
individually and as parent and next-friend of
B.R.Z., B.M.Z., K.Z., and L.Z., ELIZABETH
TURNIPSEED, and JOSHUA CHUPACK,
individually and as next friend of I.C.,

Defendants.

Case No.: 1:23-cv-04731

Hon. Sunil R. Harjani

**TRAVCO INSURANCE COMPANY'S
JURISDICTIONAL STATEMENT**

Plaintiff Travco Insurance Company ("Travco"), by and through its counsel Plunkett Cooney, for its Jurisdictional Statement following this Court's April 11, 2024 Minute Entry (Dkt. 35), states as follows:

Complete Diversity of Citizenship

1. Plaintiff Travco is an insurance carrier incorporated in the State of Connecticut, and at all times relevant hereto, maintains its principal place of business in Hartford, Connecticut, and is authorized to, and does, transact business in this District.

2. At all times relevant hereto, Defendant Crimo, Jr. is a natural person domiciled in the State of Illinois and residing in Highwood, Illinois, in this District.

3. At all times relevant hereto, Defendant Crimo, III is a natural person domiciled in the State of Illinois and residing at the Lake County Jail, in Waukegan, Illinois, in this District.

4. Plaintiff Travco does not assert any claim against Defendants Keely Roberts, Jason Roberts, Lorena Rebollar Sedano, Ricardo Toledo, Petra Toledo Josefina Toledo, Toledo, Amelia Tenorio, Antonia Melgar, Bruce Sundheim, Peter Straus, Jonathon Straus, Sylvia Vergara, Lizet Montez, Gabriela Vergara, Lauren Bennett, Michael Bennett, Terrie Bennett, Jeffrey Bennett, Debora Samuels, Elliot Samuels, Mirna Rodriguez, Oscar Sanchez, Michael Zeifert, Christine Zeifert, Elizabeth Turnipseed and Joshua Chupack in this Complaint, and these Defendants have been named in this action solely as necessary and indispensable parties.

5 At all times relevant hereto, Defendant Keely Roberts is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Keely Roberts is named as a defendant in this case due to her status as a plaintiff in the *Roberts* lawsuit only.

6. At all times relevant hereto, Defendant Jason Roberts is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Jason Roberts is named as a defendant in this case due to his status as a plaintiff in the *Roberts* lawsuit only.

7. At all times relevant hereto, Defendant Keely Roberts, as parent and next friend of C.R. and L.R., two of her minor sons, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. C.R. and L.R. are natural persons domiciled in the State of Illinois and residing in Highland Park, Illinois. C.R. and L.R. are named as defendants in this case due to their status as plaintiffs in the *Roberts* lawsuit only.

8. At all times relevant hereto, Defendant Jason Roberts, as parent and next friend of C.R. and L.R., two of his minor sons, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. C.R. and L.R. are natural persons domiciled in the State of Illinois and residing in Highland Park, Illinois. C.R. and L.R. are named as defendants in this case due to their status as plaintiffs in the *Roberts* lawsuit only.

9. At all times relevant hereto, Defendant Lauren Bennett is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Lauren Bennett is named as a defendant in this case due to her status as a plaintiff in the *Bennett* lawsuit only.

10. At all times relevant hereto, Defendant Michael Bennett is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Michael

Bennett is named as a defendant in this case due to his status as a plaintiff in the *Bennett* lawsuit only.

11. At all times relevant hereto, Defendant Lauren Bennett, as parent and next friend of W.B. and T.B., two of her minor sons, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. W.B. and T.B. are natural persons domiciled in the State of Illinois and residing in Highland Park, Illinois. W.B. and T.B. are named as defendants in this case due to their status as plaintiffs in the *Bennett* lawsuit only.

12. At all times relevant hereto, Defendant Michael Bennett, as parent and next friend of W.B. and T.B., two of his minor sons, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. W.B. and T.B. are natural persons domiciled in the State of Illinois and residing in Highland Park, Illinois. W.B. and T.B. are named as defendants in this case due to their status as plaintiffs in the *Bennett* lawsuit only.

13. At all times relevant hereto, Defendant Terrie Bennett is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Terrie Bennett is named as a defendant in this case due to her status as a plaintiff in the *Bennett* lawsuit only.

14. At all times relevant hereto, Defendant Jeffrey Bennett is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Jeffrey Bennett is named as a defendant in this case due to his status as a plaintiff in the *Bennett* lawsuit only.

15. At all times relevant hereto, Defendant Deborah Samuels is a natural person domiciled in the State of Illinois and residing in Deerfield, Illinois, in this District. Deborah

Samuels is named as a defendant in this case due to her status as a plaintiff in the *Bennett* lawsuit only.

16. At all times relevant hereto, Defendant Elliott Samuels is a natural person domiciled in the State of Illinois and residing in Deerfield, Illinois, in this District. Elliott Samuels is named as a defendant in this case due to his status as a plaintiff in the *Bennett* lawsuit only.

17. At all times relevant hereto, Defendant Lorena Rebollar Sedano is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Lorena Rebollar Sedano is named as a defendant in this case due to her status as a plaintiff in the *Sedano* lawsuit only.

18. At all times relevant hereto, Defendant Mirna Rodriguez is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Mirna Rodriguez is named as a defendant in this case due to her status as a plaintiff in the *Rodriguez* lawsuit only.

19. At all times relevant hereto, Defendant Oscar Sanchez is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Oscar Sanchez is named as a defendant in this case due to his status as a plaintiff in the *Rodriguez* lawsuit only.

20. At all times relevant hereto, Defendant Mirna Rodriguez, as parent and next friend of J.S., K.S., and O.S., her minor children, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. J.S., K.S., and O.S. are natural persons domiciled in the State of Illinois and residing in Highland Park, Illinois. J.S., K.S., and O.S. are named as defendants in this case due to their status as plaintiffs in the *Rodriguez* lawsuit only.

21. At all times relevant hereto, Defendant Oscar Sanchez, as parent and next friend of J.S., K.S., and O.S., is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. J.S., K.S., and O.S. are natural persons domiciled in the State of Illinois and residing in Highland Park, Illinois. J.S., K.S., and O.S. are named as defendants in this case due to their status as plaintiffs in the *Rodriguez* lawsuit only.

22. At all times relevant hereto, Defendant Amelia Tenorio is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Amelia Tenorio is named as a defendant in this case due to her status as a plaintiff in the *Tenorio* lawsuit only.

23. At all times relevant hereto, Defendant Antonio Melgar is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Antonio Melgar is named as a defendant in this case due to his status as a plaintiff in the *Tenorio* lawsuit only.

24. At all times relevant hereto, Defendant Amelia Tenorio, as parent and next friend of C.M., her minor child, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. C.M. is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois. C.M. is named a defendant in this case due to their status as a plaintiff in the *Tenorio* lawsuit only.

25. At all times relevant hereto, Defendant Antonio Melgar, as parent and next friend of C.M., his minor child, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. C.M. is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois. C.M. is named a defendant in this case due to their status as a plaintiff in the *Tenorio* lawsuit only.

26. At all times relevant hereto, Defendant Sylvia Vergara is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Sylvia Vergara is named as a defendant in this case due to her status as a plaintiff in the *Vergara* lawsuit only.

27. At all times relevant hereto, Defendant Lizet Montez is a natural person domiciled in the State of Illinois and residing in Gurnee, Illinois, in this District. Lizet Montez is named as a defendant in this case due to her status as a plaintiff in the *Vergara* lawsuit only.

28. At all times relevant hereto, Defendant Gabriela Vergara is a natural person domiciled in the State of Illinois and residing in Highwood, Illinois, in this District. Gabriela Vergara is named as a defendant in this case due to her status as a plaintiff in the *Vergara* lawsuit only.

29. At all times relevant hereto, Defendant Ricardo Toledo is a natural person domiciled in the State of Illinois and residing in Highwood, Illinois, in this District. Ricardo Toledo is named as a defendant in this case due to his status as a plaintiff in the *Toledo* lawsuit only.

30. At all times relevant hereto, Defendant Josefina Toledo is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Josefina Toledo is named as a defendant in this case due to her status as a plaintiff in the *Toledo* lawsuit only.

31. At all times relevant hereto, Defendant Alejo Toledo is a natural person domiciled in the State of Illinois and residing in Waukegan, Illinois, in this District. Alejo Toledo is named as a defendant in this case due to his status as a plaintiff in the *Toledo* lawsuit only.

32. At all times relevant hereto, Defendant Petra Toledo is a natural person domiciled in the State of Morales, Mexico and residing in Galeana Zacatepec, Mexico. Petra Toledo is named as a defendant in this case due to her status as a plaintiff in the *Toledo* lawsuit only.

33. Nicolas Toledo, deceased, was a natural person domiciled in the State of Morales, Mexico and residing in Galeana Zacatepec, Mexico on the date of the July 4, 2022 Shooting. Therefore Ricardo Toledo, as Special Administrator of the Estate of Nicolas Toledo, is deemed to be a citizen of the State of Illinois pursuant to 28 U.S.C. § 1332(c)(2). Ricardo Toledo, as Special Administrator of the Estate of Nicolas Toledo, is named as a defendant in this case due to his status as a plaintiff in the *Toledo* lawsuit only.

34. At all times relevant hereto, Defendant Michael Zeifert is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Michael Zeifert is named as a defendant in this case due to his status as a plaintiff in the *Zeifert* lawsuit only.

35. At all times relevant hereto, Defendant Michael Zeifert, as parent and next friend of B.M.Z., B.R.Z., K.Z., and L.Z., his minor children, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. B.M.Z., B.R.Z., K.Z., and L.Z. is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois. B.M.Z., B.R.Z., K.Z., and L.Z. are named as defendants in this case due to their status as plaintiffs in the *Zeifert* lawsuit only.

36. At all times relevant hereto, Defendant Christine Zeifert is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Christine Zeifert is named as a defendant in this case due to his status as a plaintiff in the *Zeifert* lawsuit only.

37. At all times relevant hereto, Defendant Christine Zeifert, as parent and next friend of B.M.Z., B.R.Z., K.Z., and L.Z., his minor children, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. B.M.Z., B.R.Z., K.Z., and L.Z. is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois. B.M.Z., B.R.Z., K.Z., and L.Z. are named as defendants in this case due to their status as plaintiffs in the

38. At all times relevant hereto, Defendant Elizabeth Turnipseed is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Elizabeth Turnipseed is named as a defendant in this case due to her status as the plaintiff in the *Turnipseed* lawsuit only.

39. At all times relevant hereto, Defendant Joshua Chupack is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. Joshua Chupack is named as a defendant in this case due to his status as a plaintiff in the *Chupack* lawsuit only.

40. At all times relevant hereto, Defendant Joshua Chupack, as parent and next friend of I.C., his minor son, is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District. I.C. is a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois. I.C. is named as a defendant in this case due to his status as a plaintiff in the *Chupack* lawsuit only.

41. Jaqueline Sundheim, deceased, was a natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District, on the date of the July 4, 2022 Shooting. Therefore Bruce Sundheim, as Special Administrator of the Estate of Jaqueline Sundheim, is deemed to be a citizen of the State of Illinois pursuant to 28 U.S.C. § 1332(c)(2).

Bruce Sundheim, as Special Administrator of the Estate of Jaqueline Sundheim, is named as a defendant in this case due to his status as a plaintiff in the *Sundheim* lawsuit only.

42. Stephen Straus, deceased, was natural person domiciled in the State of Illinois and residing in Highland Park, Illinois, in this District, on the date of the July 4, 2022 Shooting. Therefore, Peter Straus and Jonathan Straus, as Co-Administrators of the Estate of Stephen Straus, are deemed to be citizens of the State of Illinois pursuant to 28 U.S.C. 1332(c)(2). Peter Straus and Jonathan Straus, as Co-Administrators of the Estate of Stephen Straus, are named as defendants in this lawsuit due to their status as plaintiffs in the Strauss lawsuit only.

42. Accordingly, as required by 28 U.S.C. § 1332, complete diversity of citizenship exists between the parties in this case.

Dated this 16th day of May, 2024.

Respectfully submitted,

PLUNKETT COONEY

/s/ Drew L. Block

Charles W. Browning (ARDC #6316494)

Drew L. Block (ARDC #6288026)

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of May, 2024, I served the foregoing document to all counsel of record via electronic mail and filed this Certificate of Service with the Clerk of Court using the electronic court filing system, which will send notification to all counsel of record, and served the foregoing document to the following defendants via certified mail to the following addresses:

Robert Crimo, Jr.
115 Pleasant Avenue
Highwood, IL 60040

Robert Crimo, III, L173080
P.O. Box 38
Waukegan, IL 60079

/s/ Drew L. Block
Drew L. Block (ARDC #6288026)
PLUNKETT COONEY

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